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September 22, 1999

Lester Snow, Executive Director
CALFED Bay-Delta Program
1416 Ninth St., Suite 1155
Sacramento, CA 95814

RE: Comments on the Draft Programmatic Impact Statement and Report for
CALFED Bay Delta Program

Dear Mr. Snow:

MANAGEMENT BOARD:

*Bay Area Audubon Council
Bay Area Open Space Council
Bay Planning Coalition
Citizens Committee to
Complete the Refuge
Conservation Fund
Ducks Unlimited
National Audubon Society
Point Reyes Bird Observatory
P G & E
Save San Francisco Bay
Association
Sierra Club
The Bay Institute
Urban Creeks Council*

Ex-Officio Members:

*Bay Conservation &
Development Commission
California Department
of Fish and Game
Coastal Conservancy
Coastal Region, Mosquito &
Vector Control District
National Fish and Wildlife
Foundation
Natural Resources
Conservation Service
Regional Water Quality Control
Board, San Francisco Bay Region
San Francisco Estuary Project
U.S. Fish & Wildlife Service
Wildlife Conservation Board*

These comments are on behalf of the San Francisco Bay Joint Venture (SFBJV), a partnership of twenty three public agencies, environmental organizations, business groups and agricultural interests working cooperatively to protect, restore, increase and enhance wetlands, riparian habitat and associated uplands throughout the San Francisco Bay Region. We appreciate this opportunity to enter these comments into the formal record for the Programmatic Environmental Impact Report and Statement for the CALFED Bay Delta Program.

Many of our partner organizations listed on the letterhead have been tracking the multi-disciplinary and multi-leveled initiatives of the CALFED program for the past few years and many of them will be preparing their own, more detailed comment letters. Given that our mission is identified with the protection and restoration of the SF Estuary, our comments are limited to those aspects of the Bay-Delta program that pertain the health of the Bay. In light of this concern, it is imperative that the long term solution and "preferred alternative" maintain adequate baseline freshwater flows into the Estuary for the sake of the many beneficial uses and species dependent on them. There must be a guarantee of adequate flows and specific standards for adequacy established. Nevertheless, the EIR is vague in this regard, both in identifying adequate timing and volume of flow regimes into the Estuary.

Adequate flows are essential to the success of our collective efforts to stabilize and improve biological conditions within and reduce toxic pollutants in the Bay - particularly those from agricultural runoff within the larger San Joaquin-Sacramento watersheds. It is crucial to the long-term recovery of the 12 threatened and species of the Bay that we minimize and mitigate stressors found throughout their range. The preferred solution must address these issues, as they help define the leading component of CALFED's mission: "to restore the ecological health of the Bay-Delta."

We recognize the delicate balancing act of competing interests and needs that CALFED is seeking to reconcile. However, as with the vast majority of the Ecosystem Restoration Program Category III grants, CALFED's focus appears to be overly centered on the Delta, and not sufficiently regarding the systematic interactions between the Bay and Delta. It also avoids the stated need for more integrative analysis of the program and alternative actions under consideration. The resulting analytic fragmentation is apparent in the EIR, which serves to defer cumulative impact analysis and could readily lead to

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additional stressors on what remains of the bay ecosystem, already severely damaged by water diversions and toxic inputs.

The project description and analysis are also too fragmented to allow for the kind of programmatic, multi-species consultation and habitat protections under Section 7 of the ESA that are contemplated within this EIR. One indication of this is that the great majority of CALFED programmatic actions having been focused on fisheries improvements, to the exclusion of the other wetland wildlife and plant species. If CALFED is truly to incorporate a multi-species conservation program, it must explicitly include an integrated array of strategies and actions to support the habitat needs of other wetland dependent species – including waterfowl, shorebirds, and amphibians. This is essential to prevent further disruption to the Bay-Delta ecosystem along with significant redirected impacts, as this would violate a fundamental principle of the CALFED Program. We suggest that you look to the *San Francisco Baylands Ecosystem Habitat Goals* (March 1999) for guidance on and a model of truly integrative ecosystem planning applicable to the Ecosystem Restoration component of CALFED. (The *Habitat Goals* serves, incidentally, as the foundation for the Joint Venture's *Restoring the Estuary: An Implementation Strategy for the SFBJV*, a regional wetlands conservation and restoration plan that is forthcoming in October).

These factors, coupled with the prospect of up to 6 million acre feet of additional storage in 14 separate storage facilities being considered lead us to question how adequate flows can be assured for the bay ecosystem. A preferred solution must provide flow standards with sufficient assurance to maintain/enhance the health of the Estuary. The CALFED program presented in the EIR leads to the opposite conclusion. The lack of such guarantees, undermines regional and municipal water quality improvements around the Bay Area, and puts at risk the many and costly wetlands enhancement and restoration projects of the SFBJV's partners. We are concerned that the long term CALFED program is failing to address the full range of stressors found throughout the ecosystem and that will only be exacerbated by the additional water storage facilities proposed for Phase II. We trust that the preferred alternative will allay this concern and truly "improve the Bay-Delta Ecosystem" as an integral part of that solution.

Thank you for the opportunity to comment on the Programmatic EIR/EIS for CALFED. We look forward to working collaboratively with you in the future to ensure and restore the ecological integrity of the Bay-Delta.

Yours truly,



John Steere
Director

Cc: Board of Directors, SFBJV